



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

NOV - 8 2007

Eric F. Pastor
Pastor, Behling & Wheeler, LLC
2201 Double Creek Drive, Suite 4004
Round Rock, TX 78664

Re: Gulfco Marine Maintenance Superfund Site, Freeport, Texas
Unilateral Administrative Order, CERCLA Docket No. 06-05-05
Phase 2 Groundwater Data

Dear Mr. Pastor:

The U.S. Environmental Protection Agency (EPA) and the Texas Commission on Environmental Quality (TCEQ) have performed a review of the above referenced document dated October 12, 2007. With this letter, the EPA approves this document with the enclosed modifications. The enclosed modifications shall be incorporated in the referenced document and copies provided to the notification list within 30 days of receipt of this letter.

If you have any questions, please contact me at (214) 665-8318, or send an e-mail message to miller.garve@epa.gov.

Sincerely yours,

Gary Miller, P.E.
Remediation Project Manager

Enclosure

cc: Luda Voskov (TCEQ)
Barbara Nann (6RC-S)



823782

Internet Address (URL) • <http://www.epa.gov>

Recycled/Recyclable • Printed with Vegetable Oil Based Inks on Recycled Paper (Minimum 25% Postconsumer)

Gulfeo Marine Maintenance Superfund Site (Site)

Modifications:

1. (Hydraulic Testing, p. 3): Three monitoring wells are proposed for hydraulic testing. While the proposed wells are expected to provide a representative coverage of site conditions, none are located in the area north and downgradient of the former impoundments. The proposed MW18 shall be replaced with MW04, which is located north and downgradient of the former impoundments and should provide hydraulic information in the area downgradient of the groundwater contamination source.
2. (Natural Attenuation Evaluation, p. 4): While the presence of the chlorinated daughter products may indicate that reductive dehalogenation is occurring, these materials may have also been present in the original source material. Their presence may be due to dehalogenation, their presence in the original source material, or some combination of both. The text shall be revised to reflect this possibility.
3. (Natural Attenuation Evaluation, p. 4): Nine wells are proposed for natural attenuation evaluation monitoring. To evaluate natural attenuation processes, the sampling results from locations unaffected by site contaminants should be compared to the contaminated well results. Eight of the nine proposed wells have some level of site contaminants, and the well without any contaminants, OMW20, is located downgradient from the former impoundments. An additional monitoring well, NC2MW28, which does not contain any site contaminants, shall be added to the natural attenuation monitoring program.
4. (Table 4): Sulfate and alkalinity analysis shall be added to the analysis program for the natural attenuation monitoring wells. Sulfate, at higher concentrations, may compete with the reductive dechlorination pathway, and where sulfate is the electron acceptor in anaerobic systems, a concentration decrease may be seen. An increase in alkalinity is an indicator of both aerobic respiration and sulfate reduction (anaerobic).
5. (Figure 2): The figure shall include a notation that the fresh water pond water elevation was not measured during the water level measurements.
6. (Figures 3): The figure shall include a notation that the fresh water pond water elevation was not used in determining the potentiometric surface.